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April 22, 2021

VIA ELECTRONIC FILING

The Honorable Ona T. Wang
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: In re Application of Sukhbaatar Batbold for an Order Pursuant to 28 U.S.C. § 1782,
21-mc-00218-RA (S.D.N.Y.)

Dear Judge Wang:

We respectfully submit this letter on behalf of Petitioner Sukhbaatar Batbold in response to the letter filed yesterday by K2 Intelligence a/k/a K2 Integrity (“K2”) at ECF Docket No. 28.¹ Mr. Batbold does not oppose this first request for an extension and requests that the Court so-order a briefing schedule providing that any reply be due on or before May 17, 2021.

Respectfully submitted,

/s Orin Snyder

cc: All Counsel of Record (via ECF)

¹ K2 requested our position on this application at 2 p.m. Eastern time, or 2 a.m. Mongolia time, and proceeded to file its application approximately three hours later—or 5 a.m. Mongolia time. K2 therefore provided no opportunity for us to confer with our client regarding K2’s request.